

# EXHIBIT 11

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**From:** Adam Hoffman <ahoffman@raklaw.com>  
**Sent:** Tuesday, April 23, 2024 12:58 PM  
**To:** Sara Fish  
**Cc:** Amy E. Hayden; [SERVICE FR] Samsung-Headwater; rak\_headwater@raklaw.com  
**Subject:** Re: Headwater v. Samsung: Amended Report of Dr. Andreas Groehn

Sara, the corrections served yesterday addressed data entry errors that your own experts identified, and the corrections made by Mr. Groehn are exactly those, and with the exact same numbers, pointed out by Mr. Kline in, for example, Figures 31 and 32 of his report. Mr. Groehn issued a corrected report addressing these data entry errors the next business day after the service of Mr. Kline's report. Samsung was therefore aware of these data entry errors, and their significance, for longer than Headwater has known of them, and the calculation of the effect of correcting those errors on downstream calculations was easily calculated by either party.

In any case, we are happy to reschedule the depositions you mention below, to the degree that any new proposed dates can be accommodated by the deadline for expert discovery and other already scheduled depositions. Please let us know your proposed dates for Mr. Kline and Mr. Ugone as soon as possible. The trial in which Mr. Groehn was to testify next week was just postponed, so he is now available next week.

Regards,  
Adam Hoffman

On Apr 23, 2024, at 8:18 AM, Sara Fish <sfish@fr.com> wrote:

Counsel,

Last night, Headwater served improper "corrected" opening expert reports that made massive substantive changes to Headwater's damages contentions after Samsung served rebuttal reports. Given the scope of Headwater's improper changes, we are rescheduling the depositions of Dr. Groehn, Mr. Kline, and Dr. Ugone based on the timing of Headwater's service of these new opinions. We are still presenting Ms. Butler today at 8:30am PT.

Thank you,

**Sara Fish**  
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**From:** Amy Hayden <[ahayden@raklaw.com](mailto:ahayden@raklaw.com)>  
**Sent:** Monday, April 22, 2024 6:29 PM  
**To:** [SERVICE FR] Samsung-Headwater <[SERVICEFRSamsung-Headwater@fr.com](mailto:SERVICEFRSamsung-Headwater@fr.com)>  
**Cc:** [rak\\_headwater@raklaw.com](mailto:rak_headwater@raklaw.com)  
**Subject:** Headwater v. Samsung: Amended Report of Dr. Andreas Groehn

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[This email originated outside of F&R.]

Counsel for Samsung,

Please find attached for service the Amended Report of Dr. Andreas Groehn and Dr. Groehn's Errata Statement. I have also attached Dr. Groehn's programming code here; we'll produce this Bates-stamped later today.

To the extent that Samsung would like reschedule any survey expert depositions scheduled to occur this week, we will work with you on that.

Best regards,

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